



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

February 28, 2007

CERTIFIED MAIL – 7003 2260 0001 2753 6116
RETURN RECEIPT REQUESTED

Ms. Dana Scott
EHS Team Member--Amines, Aniline & Polyol/CCU
BASF, Corporation
8404 River Road
Geismar, LA 70734

RE: BASF Corporation (BASF)
LAD 040776809, AI No. 2049
Trial Burn Plan Notice of Deficiency

Dear Ms. Scott:

The Louisiana Department of Environmental Quality (LDEQ) has reviewed the Trial Burn Plan for Amines Boiler, Utility Boiler No. 3, and Utility Boiler No. 6 for your facility dated December 15, 2006. LDEQ finds the Trial Burn Plan deficient and offers the following list of deficiencies.

1. The Trial Burn Plan must provide diagrams and calculations of boiler volumes to enable LDEQ to verify residence times. Also, residence times provided in Section 4.2 of the plan do not match residence times provided in Table 4-1.
2. BASF is proposing minimum combustion chamber temperature limits for No. 3 and No. 6 Boilers of 1100°F and 950°F, respectively. LDEQ is concerned that temperatures of less than 1400°F are indicative of insufficient heat being generated to destroy the waste, or of thermocouple placement that is unable to give an adequate indication of combustion chamber temperatures. In a meeting between two of LDEQs Hazardous Waste Engineers and BASF employees on February 16, 2007, BASF gave a tour presented additional data to explain how thermocouple readings are representative of actual combustion chamber temperatures and how the thermocouple readings respond to combustion temperature changes in a timely manner. This data must be formally submitted to the department.
3. The introduction of the Trial Burn Plan states that each boiler burns off-gases generated at the facility. The plan must state that vents will be routed to the unit being tested (Amines Boiler or Utilities Boiler #3) during Destruction and Removal Efficiency (DRE) testing.

ENVIRONMENTAL SERVICES

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Ms. Dana Scott
BASF Corporation (BASF)
LAD 040776809, AI No. 2049
Page 2


4. Analytical data must be provided to support data presented in Tables 3-1 through 3-3. Data must be segregated for each *each* feed stream for *each* unit. Without better knowledge of individual analytes and their abundance in the waste stream, it is impossible to determine whether Toluene is an appropriate choice for a Principal Organic Hazardous Constituent. Also, since Toluene is a Class 2 compound on the thermal stability index, a restriction from burning any Class 1 compounds may be placed in the final modified permit.
5. Quarterly sampling discussed in Section 5-2 must include chlorine and metals analytes. The response given to number ten of the October 16, 2006 notice of deficiency must also be included in the Trial Burn Plan.
6. Sampling and analysis procedures must better describe whether or not waste feed sample locations are before or after the addition point for spiking materials. If waste is sampled downstream from spiking locations, it must be far enough away to ensure complete mixing.

Appendix A of the Trial Burn Plan included the Quality Assurance Project Plan (QAPP) for the Trial Burn. The following is a list of deficiencies for the QAPP.

1. Although the data (and associated quality assurance/quality control) of the hydrocarbon monitor is not required for compliance with RCRA during the Trial Burn, it will be required should BASF choose to use this data for MACT compliance. Calibration procedures for all equipment used to gather data to be reported from the Trial Burn must be included in the Trial Burn Plan (e.g. flowmeters).
2. Attachment 4 includes a process sample field data sheet. Please include additional information to explain the sample labeling.

Within thirty (30) days of receipt of this letter, BASF must submit to the Department a revised Trial Burn Plan. Please include your Agency Interest Number (2049) and Activity Number (PER20000016) on all future correspondence for this permitting action. If you have any questions or comments, please contact Ms. Rhonda Fetters of the Hazardous Waste Permits Division at (225) 219-3451.

Sincerely,


Bijan Sharafkhani, P.E.
Administrator

rsf

Attachments